

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
EDWARD JOHN LONSKI, JR	:	Case Number:1:12-bk-05965
dba Ed's Massage	:	
Debtor	:	
	:	
EDWARD JOHN LONSKI, JR	:	
dba Ed's Massage	:	
Objectant	:	
	:	
v.	:	
	:	
InSolve Recovery, LLC	:	(CLAIM #7)
Claimant	:	
	:	

TO:
InSolve Recovery, LLC ("Claimant")

NOTICE TO CLAIMANT RE FILING OF OBJECTION TO CLAIM

Attached to this notice is an objection to your proof of claim.

Your claim may be reduced, modified, or eliminated. You should read this notice and the objection carefully and discuss them with your attorney, if you have one.

The purpose of this notice is to advise you of the following rights:

(a) Within thirty (30) days after the date of this notice you are required to file one of the following with the Clerk of the Bankruptcy Court:

- (1) an amended proof of claim;
- (2) a response to the objection; or
- (3) a request for a hearing.

(b) If you send your amended proof of claim, response or request for a hearing by mail or by delivery service, you must send it so that the Clerk of the Bankruptcy Court receives it by the deadline at the following address:

Clerk, United States Bankruptcy Court
Middle District of Pennsylvania
Third and Walnut Streets
P.O. Box 908
Harrisburg, PA 17108

You are required concurrently to serve a copy of the amended proof of claim, response to the objection, or request for a hearing upon counsel for the objecting party at the following address:

KARA K. GENDRON, ATTORNEY AT LAW
125 STATE STREET
HARRISBURG PA 17101

If you do not file an amended proof of claim, a response to the objection, or a request for a hearing within thirty (30) days after the date of this notice, the Court may grant the relief requested in the objection and disallow or modify your claim without further notice or hearing.

(c) You are entitled to a hearing on the objection if you file either a written response to the objection or a written request for a hearing with the Court within thirty (30) days after the date of this notice.

(d) An attorney or pro se party who wishes to participate in the hearing telephonically must consult the Court's website (www.pamb.uscourts.gov) and click on the Telephonic Court Appearances tab to review the assigned Judge's telephone procedures.

(e) You may have other rights not referred to in this Notice.

This notice is not intended to advise you of all your rights regarding your claim and is not intended to provide legal advice. If you decline to obtain counsel regarding the attached objection, you do so at your own risk.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

This Notice was mailed to you by: /s/ Kara K. Gendron, Esquire
Dorothy L. Mott Law Office LLC
125 State Street, Harrisburg PA 17101
Phone (717) 232-6650

Date of Notice and Date of Mailing: March 19, 2015

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
EDWARD JOHN LONSKI, JR	:	Case Number:1:12-bk-05965
dba Ed's Massage	:	
Debtor	:	
	:	
EDWARD JOHN LONSKI, JR	:	
dba Ed's Massage	:	
Objectant	:	
	:	
v.	:	
	:	
InSolve Recovery, LLC	:	(CLAIM #7)
Claimant		

AMENDED OBJECTION TO PROOF OF CLAIM

COMES NOW the Debtor, by and through Kara K. Gendron, Esquire of the Dorothy L. Mott Law Office, LLC, and makes this Objection to Creditor's claim filed in the above-captioned bankruptcy proceeding, stating in support thereof as follows:

1. The Debtor filed a Chapter 13 bankruptcy proceeding on October 11, 2012.
2. The Claimant filed a proof of claim on 12/5/12 in the amount of \$8,036.03, claiming unsecured status.
3. The claim does not comply with Federal Rule of Bankruptcy Procedure 3001.
4. Federal Rule of Bankruptcy Procedure 3001(c)(1) requires that when a claim is based on a writing, a copy of the writing shall be filed with the proof of claim.
5. Rule 3001(c)(2)(A) requires an itemized statement showing all applicable interest, fees, expenses, and/or charges be filed with the proof of claim.
6. 3001(c)(2)(D) provides for sanctions, including fee shifting, if the Claimant fails to comply with 3001(c)(2)(A).
7. Claimant's claim contains no attachments or summaries.
8. The Claim is beyond the statute of limitations for collection.
9. The Claimant does not hold a valid claim.

WHEREFORE, the Debtor respectfully prays of the Court that the Claimant's claim be disallowed and dismissed.

Respectfully submitted,

/s/ Kara K. Gendron

Kara K. Gendron, Esquire
Dorothy L. Mott Law Office, LLC
125 State Street
Harrisburg, PA 17101
karagendronecf@gmail.com
(717) 232-6650 TEL
(717) 232-0477 FAX

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
EDWARD JOHN LONSKI, JR	:	
dba Ed's Massage	:	CASE NO. 1:12-bk-05965
	:	
	:	
Debtor	:	
	:	
	:	
EDWARD JOHN LONSKI, JR	:	
dba Ed's Massage	:	
	:	
	:	OBJECTION TO CLAIM # 7
Movant	:	
	:	
	:	
	:	
v.	:	
	:	
	:	
InSolve Recovery, LLC	:	
Claimant	:	

O R D E R

UPON CONSIDERATION of the Objection to Proof of Claim filed by the Debtor, and after notice and opportunity for hearing thereon, it is hereby

ORDERED AND DECREED that the Proof of Claim filed by the Claimant is disallowed and dismissed.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
EDWARD JOHN LONSKI, JR	:	Case Number:1:12-bk-05965
dba Ed's Massage	:	
Debtor(s)	:	
	:	
EDWARD JOHN LONSKI, JR	:	
dba Ed's Massage	:	
Objectant(s)	:	
	:	
v.	:	
	:	
InSolve Recovery, LLC	:	(CLAIM #7)
Claimant	:	
	:	
	:	
	:	

CERTIFICATE OF SERVICE

I, Kara K. Gendron, hereby certify that on March 19, 2015, I served a copy of the notice and objection to claim electronically or by placing the same in the United States Mail, First Class, postage pre-paid, addressed as follows:

CHARLES J DEHART III ESQUIRE
8125 ADAMS DRIVE SUITE A
HUMMELSTOWN, PA 17036

InSolve Recovery, LLC, c/o Capital Recovery Group,
Dept 3203
PO BOX 123203
DALLAS, TX 75312-3203

/s/ Kara K. Gendron
Kara K. Gendron, Esquire
Dorothy L. Mott Law Office, LLC
125 State Street
Harrisburg, PA 17101
karagendronecf@gmail.com
(717) 232-6650 TEL
(717) 232-0477 FAX